

SAMUEL E. PALLINS  
BCP# 1998-6444  
BERKS COUNTY PRISON  
BERKS COUNTY WELFARE RD.  
LEESPORT, PA. 19533-9397

Kane /  
Schmeltz

DATE: 6/28/2000

V.

COUNTY OF SCHUYLKILL ET AL.

CASE# RE: 1:00-CV-00872

JUDGE; YVETTE KANE

AMENDMENT ORDER:

RULE 15. AMEND (D) SUPPLEMENTAL PLEADING  
PART II OF PART I, RELIEF PART V.

3.) B.) REQUIRES DEFENDANTS COUNTY OF SCH.; SCH. CO.  
PRISON, AND WARDEN GERALD BRITTON TO PAY  
ALL COSTS OF DOCTOR(S) BILL(S), AND TO CONTINUE  
TREATMENT FOR LEG AND BACK INJURYS.

C.) REQUIRES DEFENDANTS COUNTY OF SCH.; SCH. CO.  
PRISON AND WARDEN GERALD BRITTON TO RE-  
LEASE ALL MEDICAL RECORDS FROM SCH. CO.  
MEDICAL DEPT.; ALL MEDICAL RECORDS FROM  
OUTSIDE DOCTOR(S).

C.) 2.) ORTHOPEDIC, DR. DAWSON; NEUROLOGIST, DR. ASIAM,  
OF TESTS, OPINION, ORDERS, PRESCRIPTIONS, OF EMG,  
MRI, AND INFORMATION, REPORTS TO PLAINTIFF AS  
WELL AS ALL PARTS OF MISSING MEDICAL RECORDS  
FROM 9/8/99 OF PLAINTIFF INCARCERATION TO

DATE: 6/28/00

- C.) 3.) 10/24/99, DATE OF INCIDENT AS WELL AS INCIDENT REPORTS AND TREATMENT THEREAFTER UP TO THE FIRST TIME SEEING DEFENDANT DR. NARANG AND ALL INFORMATION OF MEDICAL RECORDS IN THE FUTURE.
- 4.) COMPENSATORY DAMAGES IN THE AMOUNT OF \$ 300,000, TO PLAINTIFF SAMUEL E. PULLINS FROM DEFENDANTS.
- 5.) PUNITIVE DAMAGES IN THE AMOUNT OF \$ 700,000, TO PLAINTIFF SAMUEL E. PULLINS FROM DEFENDANTS.
- 7.) PLAINTIFF COST OF THIS SUIT AND LAWYER FEE.

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION, BELIEF, AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT, TO THE BEST OF MY KNOWLEDGE.

RESPECTFULLY SUBMITTED,

DATE: 6/28/2000 SAMUEL E. PULLINS  
Samuel E. Pullins

SAMUEL E. PULLINS  
 BCP# 1998-6444  
 BERKS COUNTY PRISON  
 LEESPORT, PA. 19533-9397

JUN 20  
 PER CL  
 HARRISBURG, PA. DEPT. J

I, SAMUEL E. PULLINS, AM SENDING THIS  
 LETTER TO CLERK OFFICE, U.S. DISTRICT C.  
 HOUSE, MARY E D'ANDREA CLERK, 228 BOX 983  
 HARRISBURG PA. 17108

TO LET THE COURTS BE INFORMED THAT  
 THE ABOVE NAMED PLAINTIFF SAMUEL E. PULLINS  
 HAS CHANGED FROM: SCH. CO. PRISON, 230  
 SANDERSON ST. TO: PRESENT ADDRESS BCP#  
 1998-6444, BERKS COUNTY PRISON, LEESPORT, PA.  
 19533-9397. IN BOTH CASES RE 1:00-CV-00872,  
 AND RE: 1:00-CV-00769. JUDGE YVETTE KANE.

PLAINTIFF WOULD ALSO LIKE TO ADD  
 AMENDMENT ORDER: RULE #15 AMEND (D) SUPPLE-  
 MENTAL PLEADING, PART II. OF ~~PART I~~ PART I.  
 STATEMENT OF CLAIM PART IV., AND PART II.  
 OF PART I. RELIEF PART V. CASE# RE: 1:00-CV-00  
 872, JUDGE YVETTE KANE.

THANK YOU,  
 Samuel E. Pullins

SAMUEL E. PULLINS  
BCD#1998-6444  
BERKS COUNTY PRISON,  
BERKS COUNTY WELFARE RD.  
LEESPORT, PA. 19533-9397

DATE: 6/28/2000

V.

COUNTY OF SCHUYLKILL ET AL.

CASE # RE: 1:00-CV-00872  
JUDGE: YVETTE KANE

FILED  
HARRISBURG, PA

JUN 27 2000

MARY E. D'AMICO, CLERK  
Per 215  
Dopey

### AMENDMENT ORDER:

RULE 15. AMEND (D) SUPPLEMENTAL PLEADING,  
PART II of PART I, STATEMENT of CLAIM PART IV.

- 1.) PLAINTIFF NEVER GOT A RESPONSE FROM DEFENDANTS COMMISSIONERS OFFICE; FORREST I. SHADLE; JEROM P. KNOWLES; STANLEY H. TOBASH ON ANY MATTERS MENTIONED IN PLAINTIFF COMPLAINT.
- 2.) ON 4/27/2000, PLAINTIFF SEEN DEFENDANT, DR. NARANG. THIS DEFENDANT ASKED PLAINTIFF HOW LONG HE WAS GOING TO BE IN SCH. Co. PRISON, BECAUSE HE WOULD LIKE TO RUN SOME TESTS ON PLAINTIFF. DEFENDANT, DR. NARANG ASKED PLAINTIFF HOW LONG HAS THIS PAIN BEEN GOING ON.
- 3.) PLAINTIFF EXPLAINED IT AGAIN TO DEFENDANT DR. NARANG, EVERY SINCE PLAINTIFF WAS SLAMED ON CONCRETE STEPS AND SUBDUED BY DEFENDANTS CARUSO AND ANOTHER CORRECTION OFFICER AS OFFICE STEVE BLOCHCHAK LET INMATE GOMBEZ R. GO TO CONTINUE BEATING ME WITH A MOP RINGER.

- 4.) WHEREAS A BLOW TO MY LOWER RIGHT LEG CAUSING ME TO GET EIGHT (8) FOREIGN BODY AND/OR STICHES PUT IN MY RIGHT LEG. TELLING DEFENDANT DR. NARANG ALL THIS WAS IN AND/OR SHOULD HAVE BEEN IN MY MEDICAL RECORDS.
- 5.) ALSO TELLING HIM, PATTY HOAKE WAS GIVEN PLAINTIFF MOLTRIN FROM THE START OF THIS ON 10/27/99. DEFENDANT, DR. NARANG LOOKED AT MY MEDICAL RECORDS. PLAINTIFF MEDICAL RECORDS OF THIS INCIDENT AND ALL THAT HAPPENED WAS MISSING UP TO THE POINT PLAINTIFF FIRST SEEN DEFENDANT, DR. NARANG.
- 6.) DEFENDANT, DR. NARANG ASKED PLAINTIFF WHY WASN'T ANY OF THIS IN HIS MEDICAL FILE. PLAINTIFF SAID THIS INFORMATION WAS IN MY FILES WHEN I FIRST SAW YOU AND OF THE TREATMENT I GOT FROM DEFENDANT PATTY HOAKE.
- 7.) PLAINTIFF ASKED WHY THERE WASN'T ANY INFORMATION ABOUT ME FROM THE VERY START OF BEING INCARCERATED 9/8/99 TO THE FIRST TIME I SEEN HIM. PLAINTIFF GOT UPSET STATING YOU PEOPLE CANT COVER THIS UP OR HIDE WHAT HAS BEEN DONE TO ME.
- 8.) PLAINTIFF ALSO TOLD DEFENDANT, DR. NARANG POTTSVILLE HOSPITAL SHOULD HAVE RECORDS OF THIS INCIDENT THEN DEFENDANT, CORRECTIONAL OFFICER TODD SETLOCK STATIED INMATE PULLINS IS GIVEN TRUE FACTS ABOUT WHAT HE'S SAYING BECAUSE HE WAS THERE ON DIFFERENT OCCASSIONS.
- 9.) WHEREAS PLAINTIFF TOLD DEFENDANT PATTY HOAKE AND CATHY KARADO EVERYTHING HE'S SAYING IN THE ABOVE MATTERS. DEFENDANT DR. NARANG SAID HE WOULD PRESCRIBE PLAINTIFF MEDICATION WATSON 250 2 1/2 TABLETS TWICE A DAY, TELLING PLAINTIFF HE COULD LEAVE NOW.



- 10.) ON 4/28/2000, PLAINTIFF SEEN DEFENDANT, KARADO WAS GIVEN TYLENOL AND TOLD THAT DEFENDANT, DR. NARANG SAID THATS ALL TO GIVE PLAINTIFF. PLAINTIFF ASKED TO BE PUT ON DR. LIST, TO SEE DEFENDANT, DR. NARANG BECAUSE THIS WASN'T THE MEDICATION PRESCRIBED TO PLAINTIFF BY DEFENDANT DR. NARANG
- 11.) ON 4/29, 4/30, 5/1, 5/2, 5/3 PLAINTIFF WAS GIVEN TYLENOL AND MOTRIN BY DEFENDANTS, CATHY KARADO, LT. FLANNERY, LT. GHERES, LT. EMERIC, AND LT. UHAULIK. WHEREAS PLAINTIFF COMPLAINED THAT SWOLLEN IS BACK IN LEG AND SAME SYMPTOMS ARE BACK IN LOWER BACK AND LEGS.
- 12.) ON 5/4/2000 PLAINTIFF SEEN DEFENDANT, DR. NARANG DEFENDANT CHECKED PLAINTIFF LEGS BY HITTING THEM WITH A RUBBER HAMMER FOR REFLEXES REACTION RIGHT LEG DIDN'T REACT AS LEFT LEG. DEFENDANT TOLD PLAINTIFF TO WALK ABOUT (5) FIVE STEPS FROM HIM AND BACK.
- 13.) DEFENDANT, DR. NARANG MADE AN APPOINTMENT FOR PLAINTIFF TO SEE ORTHOPEDIC. TELLING PLAINTIFF TAKE TYLENOL SAYING PLAINTIFF WOULD HAVE TO SUFFER A LITTLE WHILE FOUR A FEW DAYS TILL SOURCE OF PROBLEM IS FOUND
- 14.) ON 5/5, 5/6, 5/7, AND 5/8/2000, PLAINTIFF WAS GIVEN TYLENOL AND MOTRIN BY DEFENDANTS, CATHY KARADO, LT. FLANNERY, LT. UHAULIK, LT. GHERES. PLAINTIFF KEEP TELLING DEFENDANT, CATHY KARADO HE'S IN PAIN LOWER BACK AND LEGS ARE NUMB WITH SHOTING PAIN IN THE BACK OF MY THIGHS AND LEGS AND GETTING WORSE.

- 15.) Tylenol AND MOTRIN ISN'T DOING ANYTHING FOR THE PAIN, ASKING DEFENDANT, KARADO HOW LONG DO HE HAVE TO SUFFER BEFORE GETTING MEDICAL TREATMENT. ON 5/9/2000, PLAINTIFF ASKED DEFENDANT FOR PAIN MEDICATION, SHE DIDN'T GIVE ME ANYTHING, SAYING THAT PLAINTIFF IS FAKEN, NOTHINGS WRONG WITH ME.
- 16.) PLAINTIFF ASKED TO SEE DEFENDANT, DR. NARANG AND TO BE PUT ON DR. LIST, TELLING DEFENDANT, KARADO SHES NO DR. SO SHE SHOULD TRY GIVEN A DR. OPINION, AT ABOUT 2:15 P.M. PLAINTIFF ASKED C/O WORKING F-BLOCK TO TELL DEFENDANT, KARADO TO GIVE ME SOMETHING FOR PAIN IN MY LOWER BACK AND LEGS.
- 17.) C/O CAME BACK TO THE BLOCK AND SAID DEFENDANT KARADO WASN'T HERE AND LT. GHERES SAID HE'LL BRING SOMETHING BACK LATER AT ABOUT 4:40 P.M. DEFENDANTS KARADO AND LT. GHERES CAME TO F-BLOCK. TELLING PLAINTIFF, DEFENDANT, DR. NARANG SAID DONT GIVE ME ANYTHING.
- 18.) PLAINTIFF TOLD DEFENDANT KARADO THE PAIN IS GETTING WORSE AND VERY HARD TO DEAL WITH ALSO, ASKING HOW LONG DO I HAVE TO SUFFER WAITTING TO SEE AN ORTHOPEDIC. DEFENDANT KARADO GAVE ME Tylenol.
- 19.) ON 5/10/2000, 9:00 AM. MEDICATION PLAINTIFF ASKED FOR PAIN MEDICATION AND REFUSED TO LOCK UP BECAUSE PAIN HAS GOTTEN WORSE. PLAINTIFF, ASKED TO SEE DEFENDANTS WARDEN, BRITTON; DEPUTY, BERDINER; CAPTAIN, WARPINSKY; AND/OR A LIETENANT. DEFENDANT, LT. FLANNERY AND LT. UHAIK CAME TO F-BLOCK.

- 20.) PLAINTIFF EXPLAINED THE PAIN OF LOWER BACK AND BOTH LEGS, WHEREAS I CAN'T TAKE THE PAIN AND THAT I DIDN'T COME TO SCH. Co. PRISON IN THIS CONDITION, ITS FROM THE INCIDENT ON 10/26/99. ALSO TELLING THEM WHAT DEFENDANT, DR. NARANG ORDERED /PRESCRIBED FOR PLAINTIFF TO SEE AN ORTHOPEDIC.
- 21.) ~~ASL~~ ALSO TELLING THEM DEFENDANT, KARADO DIDN'T GIVE ME ANYTHING FOR PAIN. LIETENANT, UHAULIK SAID HE'LL LOOK INTO IT ASKING DID I HAVE ANY PROOF OF THIS I TOLD HIM IT SHOULD BE IN MY MEDICAL FILES AND I'M TO SEE AND ORTHOPEDIC. AND I TOLD HIM DEFENDANTS, CATHY KARADO, AND WARDEN, BRITTON KNOW ABOUT THIS MATTER.
- 22.) BECAUSE I'VE TOLD THE WARDEN I WILL TAKE LEGAL ACTION ~~AGAINST~~ AGAINST HIM AND EVERYONE INVOLVED IN WHAT HAS HAPPENED TO ME. PLAINTIFF WAS TAKEN TO POTTSVILLE HOSPITAL AT ABOUT 12:30 AFTERNOON FOR X-RAYS ON MY BACK, BUT NOT THE LEG THATS GIVEN ME PROBLEM WITH FOREIGN BODY LEFT IN IT.
- 23.) PLAINTIFF ASKED X-RAY NURSE SALLY WHY SHE DIDN'T X-RAY MY RIGHT LEG. NURSE SALLY SAID DEFENDANT GENE BERDINER SAID JUST DO X-RAYS ON HIS BACK. TOM BAVENS AND PAUL TAYLOR WAS THE TWO CORRECTION OFFICERS AT POTTSVILLE HOSPITAL,
- 24.) DEFENDANT PAUL TAYLOR TOLD THE NURSE ABOUT THE INCIDENT WITH MY LEG BEING PART OF THE PROBLEM OF MY COMPLAINTS SINCE 10/26/99, BEING HIT ON THE LEG WITH A MOP RINGER THIS OFFICER ALSO SEEN THIS INCIDENT HE'S THE OFFICER TO WRITE-UP THIS INCIDENT ON 10/26/99. NURSE SALLY WOULDN'T X-RAY THE LEG.



- 25.) GETTING BACK AT ABOUT 2:00-2:30 P.M. PLAINTIFF ASKED TO SEE DEFENDANT KARADO TO TELL HER THE HOSPITAL DIDN'T X-RAY HIS LEG, C/O DEE ANGELO SAID SHE LEFT. PLAINTIFF WENT BACK TO THE BLOCK. DEFENDANT KARADO CAME TO F-BLOCK AT ABOUT 4:00 4:30 PM. AND GAVE PLAINTIFF A MOLTRIN 600 MG.
- 26.) STATING DEFENDANT DR. NARANG PRESCRIBED PLAINTIFF THIS MEDICATION 3 TIMES A DAY, NEVER SEEING PLAINTIFF. ALSO STATING PLAINTIFF WILL SEE ORTHOPEDIC 5/11/2000. PLAINTIFF SEEN DEFENDANT CATHY KARADO 9:00 AM. MEDICATION AND WAS GIVEN MOLTRIN 600 MG. SHE TOLD PLAINTIFF HE WOULD BE GOING TO SEE DR. DAWSON ORTHOPEDIC TODAY.
- 27.) PLAINTIFF SEEN DEFENDANT LT. GHERES AND ASKED FOR PAIN MEDICATION HE WENT AND GOT A MOLTRIN 600 MG. FOR PLAINTIFF. I NEVER SEEN A ORTHOPEDIC THIS DAY AND/OR SEEN DEFENDANT KARADO. I DID GO BACK TO POTTSVILLE HOSPITAL AND GOT MY LEG X-RAYED A COUPLE DAYS AFTER GETTING BACK X-RAY.
- 28.) ON 5/12/2000, PLAINTIFF WAS GIVEN MOLTRIN 600 MG. THAT MORNING AND AFTERNOON BY DEFENDANT, LT. FLANNERY, HE SAID MY NAME WASN'T IN THE BOOK BUT GAVE PLAINTIFF TOLD DEFENDANT LT. FLANNERY DEFENDANT KARADO SAID PLAINTIFF WAS TO GO SEE ORTHOPEDIC YESTERDAY ON 5/11/2000. HE SAID HE DIDN'T KNOW ANYTHING ABOUT IT. WHEREAS PAUL TAYLOR SAID DEFENDANT LT. FLANNERY THROW APPOINTMENT OF PLAINTIFF IN GRABAGE.

- 29.) DEFENDANT, LT. GHERES WOULDN'T GIVE PLAINTIFF MEDICATION BECAUSE HIS NAME WASN'T IN MEDICATION BOOK. ON 5/13/2000, PLAINTIFF SEEN LT. UHAULIK 9:00 AM MEDICATION, HE SAID PLAINTIFF NAME WASN'T IN THE BOOK ALSO, BUT LOOK IN ONE OF THE DRAWS ON THE MED CART AND FOUND A PILL BOTTLE WITH MY NAME ON IT AND GAVE ME MOLTRIN 600 MG.
- 30.) PLAINTIFF TOLD DEF. LT. GHERES TO LOOK IN ONE OF THE DRAWS ON MED CART, THIS NIGHT AND HE GAVE PLAINTIFF 600 MG MOLTRIN IN A BOTTLE WITH MY NAME ON IT AND GAVE PLAINTIFF MEDICATION. ON 5/14/2000, PLAINTIFF SEEN LT. UHAULIK AT 9:00 AM MEDICATION HE SAID NAME STEEL WASN'T IN MEDICATION BOOK, BUT HE FOUND PILL BOTTLE WITH PLAINTIFF NAME AND GAVE PLAINTIFF 600 MG MOLTRIN.
- 31.) PLAINTIFF AND LT. UHAULIK TALKED ABOUT THE ABOVE MATTERS, ALSO ABOUT HOW NO GUARDS/CORRECTIONAL OFFICERS AREN'T SUPPOSE TO GIVE OUT MEDICATION, WHEREAS THEY OPEN BOTTLES GIVEN PLAINTIFF AS WELL AS OTHER INMATES MEDICATION WITH THEIR HANDS. PLAINTIFF TOLD LT. UHAULIK, HE WAS TO SEE ORTHOPEDIC DR. DAWSON ON 5/11/2000 NEVER HAPPENED AND/OR NEVER SEEN DEFENDANT KARADO TO THIS POINT EITHER.
- 32.) LT. EMERIC CAME AROUND WITH MEDICATION CART 8:30 PM. HE WOULD GIVE PLAINTIFF MEDICATION BECAUSE PLAINTIFF NAME WASN'T IN MEDICATION BOOK. ON 5/15/2000 AT 9:00 AM MEDICATION PLAINTIFF SEEN DEFENDANT CATHY KARADO. TOLD HER PLAINTIFF DIDN'T SEE ORTHOPEDIC 5/11/2000 AND
- 33.) ALSO TOLD HER, HIS NAME WASN'T IN THE BOOK FOR PRESCRIBED MEDICATION. STATING PLAINTIFF WAS PUT IN THE HOLE, SOLITARY CONFINEMENT, BECAUSE DEFENDANT KARADO DON'T DO HER JOB, AMONG OTHER WRONGS DONE TO PLAINTIFF FROM DAY ONE OF THIS INCIDENT 10/26/99 WITH SCH. CO. PRISON AND ALL ITS ~~TEAM~~ MEM.

- 34.) DEFENDANT, KARADO, SAID "YOUR NAME IS IN THE MEDICATION BOOK GET OUT OF HERE, I DON'T WANT TO BE HERE THAT, AS SHE GAVE PLAINTIFF A MOLTRIN 600 MG. DEFENDANT KARADO DIDN'T LOOK IN THE BOOK AND DID NOT SAY ANYTHING ELSE TO PLAINTIFF. SO, PLAINTIFF TOLD CORRECTIONAL OFFICER DEVLIN HE WANTED TO SEE THE LT.
- 35.) SO AFTER % DEVLIN AND DEFENDANT KARADO, LEFT F-BLOCK AND WENT TO C-BLOCK TO DO MEDICATION % DEVLIN CAME BACK TO F-BLOCK AND TOLD PLAINTIFF HE LOOKED IN THE BOOK AND PLAINTIFF NAME WASN'T IN THE BOOK, AND HE TOLD DEFENDANT CATHY KARADO TO LOOKED AND SEE FOR HER-SELF AND IT WAS NOT IN THE BOOK.
- 36.) DEFENDANT, LT. FLANNERY AND % DEVLIN CAME TO F-BLOCK ABOUT 15 TO 20 MINUTES LATER. I EXPLAINED THE ABOVE MATTERS TO DEFENDANT LT. FLANNERY, WHEREAS HE WAS FULLY AWARE WITH KNOWLEDGE OF A MATTERS MENTIONED IN THIS COMPLAINT. PLAINTIFF TOLD THEM HE'S TAKEN LEGAL ACTION AGAINST SCH. Co. PRISON AND HAVE WROTE DEFENDANT KARADO UP ONCE BEFORE, AND THAT I WOULD PUT IN ANOTHER COMPLAINT AGAINST THIS DEFENDANT KARADO (SEE EXHIBIT-14), BECAUSE I SHOULDN'T HAVE TO SUFFER IN PAIN FOR DAYS, BECAUSE DEFENDANT KARADO DON'T WANT TO DO HER JOB, ALSO AFTER WRITTEN THIS GRIEVANCE I GAVE IT TO LIEUTENANT, FLANNERY. ON 5/15/2000, AFTER 3:30 LOCK-UP DEFENDANT STEVE BLOSHCHAK WAS PUT ON F-BLOCK, TO WORK THE BLOCK.
- 38.) PLAINTIFF, TOLD % WORKING IN B-CONTROL THAT HE WANTED TO SEE THE WARDEN, DEPUTY WARDEN, CAPTAIN ALL DEFENDANTS, BECAUSE PLAINTIFF FEAR FOR HIS LIFE AROUND DEFENDANT STEVE BLOSHCHAK AND WHAT HE CAN GET INMATES TO DO TO PLAINTIFF. % WORKING B-CONTROL TOLD PLAINTIFF HE WOULD TAKE HIM TO THE WARDEN AND FILED A COMPLAINT AGAINST HIM.

- OUT A REQUEST AND/OR GRIEVANCE FORM AND GAVE IT TO % JEFF BOWERS SEE (EXHIBIT #15) THIS OFFICER
- 39) SAID HE TOOK PLAINTIFF REQUEST AND/OR GRIEVANCE FORM TO THE WARDEN DEFENDANT BRITTON. DEFENDANT STEVE BLOSCHICHAK WAS TAKEN OFF THE BLOCK-F THAT DAY. ON 5/17/2000, PLAINTIFF WAS TAKEN TO ORTHOPEDIC, DR. DAWSON, 739 EAST NORWEGIAN ST., AT ABOUT 1:00 PM. WITH DEFENDANT PAUL TAYLOR AND TODD SETLOCK.
- 10) DR. DAWSON DID SOME TEST ON PLAINTIFF, ASKED PLAINTIFF WHAT HAPPENED TO HIM TO CAUSE BACK AND LEG PAIN. PLAINTIFF TOLD DR. DAWSON, HE WAS FIGHTEN A COUPLE INMATES, WHEREAS TWO (2) CORRECTION OFFICERS PULLED AND/OR SLAMMED PLAINTIFF DOWN BACKWARDS ON TO CONCRETE STAIRS ON MY BACK, IN F-BLOCK.
- 11) ONE CORRECTION OFFICER LET ONE OF THESE INMATES GO TO PROCEED HITTING ME WITH A MOP RINGER AS I KICKED AT HIM TO KEEP FROM GETTING HIT IN THE HEAD, WHEREAS I GOT HIT ON THE RIGHT LEG RECEIVING 8 FOREIGN BODY IN MY LOWER LEG, PLAINTIFF BACK AND LEG HAS BEEN IN PAIN EVERY SINCE 10/24/00.
- 12) ALSO PLAINTIFF STATED DEFENDANT PATTY HOAKE LET A FOREIGN BODY IN MY LEG, (CORRECTION OFFICER JASON CARESTIA WITNESS THIS NURSE LEAVEN A FOREIGN BODY IN MY LEG.) PLAINTIFF TOLD DR. DAWSON HOW HE COMPLAINED TO BOTH DEFENDANT PATTY HOAKE AND CATHY KARADO ABOUT THE BACK AND LEG PAIN THEY WOULD JUST GIVE ME MOTRIN SAYING THE PAIN WILL GO AWAY WHEN THE LEG HEELS.
- 13) DR. DAWSON LOOKED AT MY X-RAYS FROM POTTSVILLE HOSPITAL AND SAID HE DIDNT SEE THE FOREIGN BODY IN MY LEG AND SAID SOMETHING ABOUT PLAINTIFF WITH DISC THEN SAYING PLAINTIFF PROBABLY HAS A DE



- 14) PLAINTIFF TOLD DR. DAWSON THIS PAIN DIDN'T START TO AFTER THIS INCIDENT, I'M 34 YEARS OF AGE. DR. DAWSON SAID KEEP TAKEN MOLTRIN 600 MG. AND HE PRESCRIBED A MRI, AND A EMG BY A NROLOGIST. PLAINTIFF TRIED TALKING TO DEFENDANT CATHY KARADO AND SHE SAID I'VE TALKED TO DR. DAWSON ALREADY.
- 15.) ON 5/18/2000, PLAINTIFF HAVE-N'T SEEN DEFENDANT CATHY KARADO AT ALL TODAY, BUT DEFENDANTS LT. FLANNERY AND LT. UHAULIK GAVE PLAINTIFF MEDICATION OUT OF A BOTTLE WITH THERE HANDS AS ALWAYS WITHOUT A DOCTOR AND/OR NURSE PRESENT AN UN-PAKED.
- 16.) PLAINTIFF SEEN DEFENDANT CATHY KARADO AT 9:00 AM. MEDICATION, SHE GAVE PLAINTIFF A MOLTRIN 600mg. PLAINTIFF ASKED DEFENDANT KARADO WOULD HE BE DENIED TREATMENT AGAIN OR WOULD HE GET TREATMENT THAT DR. DAWSON ORDERED AND/OR PRESCRIBED WHICH IS THAT PLAINTIFF GET AN EMG, AND A MRI.
- 17.) DEFENDANT KARADO SAID PLAINTIFF WOULD BE GOING TO GET A EMG IT WAS PRESCRIBED AND SCHEDULED, ALREADY AT ABOUT 12:30 THIS AFTERNOON PLAINTIFF RECIEVED THE DOCKET NUMBER FOR THIS CASE, COMPLAINT ~~AGAINST~~ AGAINST SCHUY/KILL COUNTY PRISON.
- 18.) ABOUT 30 MINUTES AFTER THAT CAD DEE AN GELOW BROUGHT PLAINTIFF THREE(3) PAPERS TO SIGN HE WANTS SCH. CO. PRISON TO TAKE THE \$150.00 FILING FEE, FROM INMATE ACCOUNT. WHEN IT WAS TIME TO COME OUT OF LOCK-UP, ~~CARR~~ DEFENDANT STEVE BIOSCHICHAK WAS PUT ON F-BLOCK TO SCARE, HUR HARASS PLAINTIFF IN SOME WAY.



- 49.) PLAINTIFF STARTED YELLING HOW HE FEAR HIS LIFE WITH THIS DEFENDANT ON F-BLOCK AROUND HIS- PERSON HITTING ON THE WINDOW OF B-CONTROL ASKING TO SEE DEFENDANTS WARDEN BRITTON, DEPUTY WARDEN BERDINER, CAPTAIN AND/OR LT. GHERES TO COME TO F-BLOCK. DEFENDANT BIOSCHICKAK WAS TAKEN OF THE BLOCK AND PAUL TAYLOR WAS PUT ON THE BLOCK. SEE (EXHIBIT #16)
- 50.) ON 5/20/2000, PLAINTIFF SEEN DEFENDANT LT. FLANNERY AT 9:00 AM. MEDICATION GETTING A MOLTRIN 600 MG. AND PLAINTIFF GAVE A GRIEVANCE TO BE GIVEN TO DEFENDANT WARDEN BRITTON ASKING THAT DEFENDANT STEVE BIOSCHICKAK BE KEPT AWAY FROM PLAINTIFF SEE (EXHIBITS #15, #16).
- 51.) ON 5/22/2000, PLAINTIFF WROTE THE POTTSVILLE HOSPITAL, MEDICAL RECORDS DEPT., POTTSVILLE PA. 17901. ASKING FOR ALL RECORDS OF TREATMENT ON 10/26/99; 5/10, 5/13/2000, FOR TREATMENT OF RIGHT LEG AND LOWER BACK.
- 52.) 5/21, AND 5/25/2000, PLAINTIFF TOLD HE'S FAMILY ABOUT THE ABOVE MATTERS AND HOW SCARED HE WAS TO BE IN SCH. CO. PRISON, ALSO FEARING FOR HIS LIFE. PLAINTIFF FAMILY POSTED HIS BAIL. PLAINTIFF WENT TO BERKS COUNTY PRISON TO TAKE CARE OF DETAINER.
- 53.) PLAINTIFF WAS TAKEN TO ~~BERKS CO. PRISON~~ BERKS CO. PRISON 5/26/2000, WITH RECORDS OF TAKEN 600 MG. OF MOLTRIN (3) THREE TIMES A DAY, WITH APPOINTMENTS TO GET A MRI, AND A EMG. WHERE AS THE APPOINTMENT FOR THE EMG WAS SET UP FOR JUNE 9<sup>TH</sup> 2000.

DATE: 6/28/2000

- 54.) ON 5/29/2000 AT ABOUT 11:00 PM. PLAINTIFF SEEN INTAKE NURSE, TELLING HER ABOUT MY LOW BACK AND LEG PROBLEMS FROM A INCIDENT IN SE CO. PRISON, WHEREAS I HAD AN APPOINTMENT TO SEE A DR. ON THE 9<sup>TH</sup> OF JUNE, TO GET AND EMG AND A MRI.
- 55.) SHE ASKED HOW LONG WOULD PLAINTIFF BE INCARCERATED AT THIS PRISON, PLAINTIFF STATED HE DIDN NO. PLAINTIFF TOLD HER HE WAS TAKEN MOLTRIN 600 MG THREE (3) TIMES A DAY. SHE GAVE PLAINTIFF (3) MOLTRIN, 200 MG A PIECE AFTER PLAINTIFF TOLD HE HE HAVENT GOTTEN ANY MEDICATION UP TO THIS POINT.
- 56.) PLAINT WROTE THE DEPUTY WARDEN <sup>5/27/2000</sup> ABOUT THE ABOVE MATTERS. ON 5/30, 5/31, 6/1, 6/2, 6/3, 6/4 PLAINT HAVENT RECIEVED ANY MEDICATION AND/OR TREATMENT. PLAINTIFF KEEP COMPLAINING TO CORRECTION OFFICERS. THEY SAY THEY TELL NURSES. I COMPLAIN TO THIS PRISON NURSE THEY TELL ME THEY'LL LOOK INTO IT, AND/OR JUST KEEP ON WALKING BY WITH NO RESPONSE TO MY COMPLAINTS.
- 57.) ON 6/5/2000 PLAINTIFF WROTE OUT A COMPLAINT TO THE WARDEN OF BERKS CO. PRISON. PLAINT WENT TO THE MEDICAL DEPT. AT BERK CO. PRISON AT 11:00 AM. TO GET A CHEST X-RAY BECAUSE PLAINTIFF IS POSITIVE REACTOR TO T.B. SHOT, AT THIS TIME
- 58.) PLAINTIFF EXPLAINED THE ABOVE MATTER TO A NURSE. SHE WENT AND FOUND THE PAPER IN MY FILE, GAVE PLAINTIFF 3 MOLTRIN 200 MG. A PIECE. PLAINTIFF TOLD HER ABOUT THE APPOINTMENT FOR EMG AND MRI. SHE SAID IT WOULD ALL BE TAKEN CARE. ON 6/6, 6/7/2000, PLAINT HAS GOTTEN MOLTRIN (2) TIMES A DAY MORNING AND NIGHT.

DATE: 6/28/2000

- 59.) ON 6-9-2000, AT ABOUT 12:00 AFTERNOON, PLAINTIFF WAS TAKEN TO SEE A NEUROLOGIST, DR. MOHAMMAD ASLAM, 101 MILL CREEK AVE. POTTSVILLE PA. 17901. PLAINTIFF TOLD DR. ASLAM ABOUT HIS LOWER BACK AND RIGHT LEG AND HOW THE PAIN IS GETTING WORSE, WHEREAS MY LEGS ARE NUMB WITH SHOTTING PAIN. THROU THE BACK OF MY THIGHS.
- 60.) PLAINTIFF TOLD DR. ASLAM, HIS BACK HURTS 24 HRS. A DAY, IF I TRY STANDING UP FOR A PERIOD LONGER. THEN A FEW MINUTES THE PAIN WORSEN. PLAINTIFF TOLD HIM WHEN PAIN STARTED AFTER I WAS SLAMED ON MY BACK, ON CONCRETE STEPS, BY GUARD GUARDS AS THEY SUBDUED PLAINTIFF ON THE STEPS. ANOTHER GUARD LET AN INMATE GO TO PROCEED IN HITTING ME WITH A MOP RINGER.
- 61.) DR. ASLAM DID SOME TEST ON MY LEGS WITH AN EMG MACHINE. AFTERWARDS STATING ONE LEG IS WEAKER THEN THE OTHER AND THAT PLAINTIFF COULD HAVE A DISLOCATED DISC IN HIS BACK FROM THE GUARDS SLAMING ME ON MY BACK ON-TO THE CONCRETE STAIRS. THIS DR. ASLAM ORDERED PLAINTIFF TO HAVE A MRI DONE.
- 62.) PLAINTIFF WAS GIVEN MOTRIN (2) TWO TIMES A DAY ON 6/10, 6/11, 6/12, 6/13, ON 6/11/2000 PLAINTIFF WAS MOVED FROM D-UNIT (206) TO J-UNIT (103) ON 6/12/2000 PLAINTIFF SIGNED UP FOR SICK CALL BECAUSE PLAINTIFF WAS PUT ON A TOP BUNK AND NOT BEING GIVEN MEDICATION, 3 TIMES A DAY.
- 63.) ON 6/14/2000, PLAINTIFF SEEN NURSE ON THE J-UNIT AFTER BEING CALLED IN FROM OUT SIDE BETWEEN 9 AND 11 AM. PLAINTIFF, EXPLAINED THE ABOVE MATTERS, THE INCIDENT ON 10/26/99, THE BACK AND LEGS PAIN. THE DOCTOR(S) DR. DAWSON AND DR. ASLAM, AND THEIR DATE: 6/28/2000.

OPINIONS AND TEST RUN ON PLAINTIFF ALONG WITH WHAT BOTH OF THESE DOCTORS ORDERED AND/OR PRESCRIBED.

- 64.) LATER, THIS DAY 6/14/2000 PLAINTIFF WAS CALLED TO THE MEDICAL DEPT. OF BERKS CO. PRISON THE SAME NURSE THAT CAME TO THE BLOCK A MALE NURSE, HE PUT PLAINTIFF ON DOJ STAT. AND GAVE PLAINTIFF SUPPLE OF MOLTRIN TO LAST 6/14 THUR 6/28 WHEN NEEDED DOING THE DAY.
- 65.) ALSO PUTTING PLAINTIFF ON LIST FOR MEDICATION CART MORNING AND NIGHT FOR MOLTRIN 600 MG TWICE A DAY. SEE (EXHIBITS #17 AND #18).
- 66.) THEN PLAINTIFF WAS CALLED INTO NURSE MARTY OFFICE, WHO SHE ASKED PLAINTIFF WHAT HAPPENED AND PLAINTIFF TOLD HER ALL THE ABOVE MATTERS. NURSE MARTY SAID SHE WOULD CALL SCH. CO. PRISON AND TELL THEM SHE'S GOING TO SETUP AN APPOINTMENT FOR PLAINTIFF MRI, AND
- 67.) SCH. CO. PRISON IS FULLY RESPONSIBLE FOR IT AND THE APPOINTMENT FOR BERKS CO. PRISON TAKING PLAINTIFF TO DR. ASLAM FOR EMG, BECAUSE THIS TREATMENT CAME FROM A INCIDENT THAT HAPPENED IN SCH. CO. PRISON WITH CORRECTION OFFICERS, PLAINTIFF WAS SENT BACK TO J-UNIT WITH DOCTOR ORDER TO THE JAILER AND MEDICATION TREATMENT PASS.
- 68.) PLAINT HAS BEEN TAKEN MOLTRIN 600 MG (3) THREE TIMES A DAY UP TO THIS DAY 6/20/2000 AT BERKS CO. PRISON HAVENT WENT TO SEE DOCTOR FOR MRI, WHERE THIS SHOULD HAVE BEEN THE FIRST PART OF TREATMENT, TO FINDING THE SORCES OF THE PAIN PROBLEMS IN PLAINTIFF. DATE: 6/20/2000



BACK AND LEG(S), PLAINTIFF IS IN CONTINUES PAIN 24 HRS. A DAY.

- 69.) PLAINTIFF BACK AND LEG WILL NEVER BE THE SAME. PLAINTIFF ENDURE BACK AND LEG PAIN TILL THE DAY HE DIE ALSO LIVEN WITH THE SCARES AND A FOREIGN BODY IN HIS LEG WHEREAS IN THE FUTURE PLAINTIFF COULD POSSIBLY LOSE HIS RIGHT LEG FROM IN FECTION OF THIS FOREIGN Body.
- 70.) THERE IS NO PRICE TO AMOUNT TO A HUMAN-BANE BACK AND LEG(S) WHEREAS PLAINTIFF WILL NOT BE ABLE TO GO BACK TO HIS CAREER AS BEING A ~~WELDER~~ WELDER ANY PHYSICAL WORK THESE ARE SOME REASON(S) AS TO WHY PLAINTIFF UPED MONEY DAMAGES.

I HAVE READ THE FOREGOING COMPLAINT AND HERE BY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION, BELIEFS, AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT, TO THE BEST OF MY KNOWLEDGE.

DATE: 6/28/2000 Samuel E. Pullins





COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

EXHIBIT #13  
DATE: 6/28/2000

April 19, 2000

MIKE FISHER  
ATTORNEY GENERAL

16th Floor, Strawberry Square  
Harrisburg, PA 17120  
(717) 787-6346

Ms. Samuel E. Pullins  
Schuylkill County Prison  
230 Sanderson Street  
Pottsville, PA 17901

Dear Mr. Pullins:

Attorney General Fisher has referred your letter to the Criminal Law Division for a reply.

The authority of the Office of Attorney General is defined by Pennsylvania statutes. The jurisdiction of the Office of Attorney General to investigate and prosecute is primarily derived from the Commonwealth Attorneys Act, 71 P.S. § 732-201 et seq., which limits the purview of the Attorney General to matters involving state employees, organized crime, narcotics, insurance fraud, Medicaid fraud or matters arising out of the statewide investigating grand jury. Accordingly, the matter you raise in your letter does not fall within our jurisdiction.

We recommend that you consult your own attorney. If you do not have an attorney, we suggest that you contact the bar association referral service in your county or the Pennsylvania Bar Association in Harrisburg at 1-800-932-0311.

Thank you for sharing your concerns with the Office of Attorney General.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Heather A. Moyer".

Heather A. Moyer  
Deputy Attorney General  
Criminal Prosecutions Section

HAM/pjc  
CRA000167

FORM DC-135A <b>DATE: 6/28/2000</b> <b>EXHIBIT #14</b>  <b>INMATE'S REQUEST TO STAFF MEMBER</b>		SCHUYLKILL COUNTY PRISON 7/29/87 COMMONWEALTH OF PENNSYLVANIA  DEPARTMENT OF CORRECTIONS  INSTRUCTIONS  Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.	
1. TO: (NAME AND TITLE OF OFFICER) <b>WARDEN, GERALD BRITTON</b>		2. DATE <b>5/15/2000</b>	
3. BY: (INSTITUTIONAL NAME AND NUMBER) <b>SAMUEL E. PULLINS</b>		4. COUNSELOR'S NAME <b>JOE</b>	
5. WORK ASSIGNMENT <b>Block-F-CELL #17</b>		6. QUARTERS ASSIGNMENT	
7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.			
<p>PLAINTIFF WAS PRESCRIBED MEDICATION BY DR. LIARANG 5/10/2000, MELTRON 600mg. ONCE AGAIN PLAINTIFF WASN'T GIVEN MEDICATION CURRENTLY, BECAUSE CATHY KARADO DIDN'T PUT PLAINTIFF IN MEDICATION BOOK ON MED CART. LT. FLANNERY, LT. UHAULIK, LT. GHERES, LT. EMERIC, AND C/O DEVLIN ALL LOOKED IN THE BOOK NOT SEEING PLAINTIFF NAME IN MEDS BOOK (5/12, 5/13, 5/14). PLAINTIFF SEEN DEFENDANT CATHY KARADO 5/15/2000 AT 9:00AM, MEDICATION AND ASKED WHY HIS NAME WASN'T IN THE MEDICATION BOOK ON THE CART. DEFENDANT CATHY KARADO SAID "YOUR NAME IS IN THE BOOK GET OUT OF HERE I DON'T WANT TO HEAR THAT, C/O DEVLIN LOOKED IN THE BOOK AFTER LEAVEN F-BLOCK MY NAME WAS NOT IN THE BOOK. PLAINTIFF IS IN GREAT PAIN OF HIS LOWER BACK AND RIGHT LEG FROM AN INCIDENT IN SCH. CO. PRISON CARE (INCIDENT 10/24/99). DEFENDANT CATHY KARADO HAS SHOWN A PATTERN OF GROSS NEGLIGENCE, MALPRACTICE, DELIBERATE INDIFFERENCES, OF SERIOUS MEDICAL NEEDS, DENYING, AND/OR DELAYING ACCESS TO MEDICAL CARE, NOT CARRYING OUT DOCTOR ORDERS MAKE MEDICAL STAFF INADEQUATE, WHEREAS PROFESSIONAL CARE IS IMPOSSIBLE TO PLAINTIFF AND OTHER INMATES INCARCERATED IN SCH. CO. PRISON.</p> <p>I GAVE THIS REQUEST AND/OR GRIEVANCE TO LIEUTENANT MICHAEL FLANNERY</p> <p>X Samuel E. Pullins 5/15/2000</p>			
<input type="checkbox"/> TO DC-14 CAR ONLY		<input type="checkbox"/> TO DC-14 CAR AND DC-15 IRS	
STAFF MEMBER		DATE	

FORM DC-135A

EXHIBIT #15

DATE: 6/28/2000

INMATE'S REQUEST TO STAFF MEMBER

SCHUYLKILL COUNTY PRISON 7/29/87  
COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF CORRECTIONS

## INSTRUCTIONS

Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.

DEPUTY WARDEN, GENE BERDINER

1. TO: (NAME AND TITLE OF OFFICER)

WARDEN GERALD BRITTON

2. DATE

5/15/2000

3. BY: (INSTITUTIONAL NAME AND NUMBER)

SAMUEL E. PILLINS

4. COUNSELOR'S NAME

JOE

5. WORK ASSIGNMENT

F-BLOCK, CELL #17

6. QUARTERS ASSIGNMENT

7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.

WHEN, PLAINTIFF TALKED TO YOU, ~~HE~~<sup>ON</sup> 2/10/2000, PLAINTIFF TOLD YOU THAT G/O STEVE BLOSCHICKAK PAID INMATES TO BEAT PLAINTIFF UP ON 10/26/99, AFTERWARDS GETTING PLAINTIFF IN THE HOLE TELLING PLAINTIFF TO KEEP HIS MOUTH CLOSED OR HE WOULDN'T LIVE TO TELL ANYONE ABOUT IT. INMATES AND G/O HAVE TOLD YOU ABOUT THIS MATTER NOTHING WAS DONE, NOW I'M IN GREAT FEAR OF MY LIFE, ESPECIALLY WEND HE'S PUT ON A BLOCK WITH ME, HE'S PARTLY AT FAULT OF MY LOWER BACK AND RIGHT LEG INJURIES, PAIN AND SUFFERING 24 HRS A DAY. I WANT TO PRESS CHARGES AGAINST THIS GUARD STEVE BLOSCHICKAK AND A RESTRAINING ORDER KEEPING HIM AWAY FROM ME

8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)

Samuel E. Pillins  
5/15/2000

I GAVE THIS  
REQUEST AND/OR GRIEVANCE  
TO JEFF BOWERS

☐ TO DC-14 CAR ONLY☐ TO DC-14 CAR AND DC-15 IRS

STAFF MEMBER

DATE

FORM DC-135A <b>DATE: 6/28/2000</b> <b>EXHIBIT # 14</b> <b>INMATE'S REQUEST TO STAFF MEMBER</b>		SCHUYLKILL COUNTY PRISON 7/29/87 COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS  INSTRUCTIONS Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.	
1. TO: (NAME AND TITLE OF OFFICER) DEFENDANT, WARDEN GERALD BRITTON		2. DATE 5-19-2000	
3. BY: (INSTITUTIONAL NAME AND NUMBER) PLAINTIFF, SAMUEL E. PULLINS		4. COUNSELOR'S NAME JOE	
5. WORK ASSIGNMENT F-Block		6. QUARTERS ASSIGNMENT CELL #17	
7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS. <p>             I WROTE OUT A REQUEST AND/OR GRIEVANCE STATING FACTS ABOUT DEFENDANT STEVE BLOSCHICHAK AND HOW HE TREATEN MY LIFE, PUT OUT A CONTRACT OUT ON MY PERSON, AND HOW I FEAR MY LIFE WITH HIS PRESENTS AROUND ME, AND HOW HE COULD PAY SOMEONE TO HURT PLAINTIFF AGAIN, BUT YOU REFUSE TO ADDRESS ANY PART OF THIS MATTER AND/OR TO RELIEF OF ANY REMEDIES IN THIS MATTER. THIS OFFICER IS A THREAT TO MY LIFE AND YOU ARE AT FAULT JUST AS MUCH AS HE AND OTHER DEFENDANTS. YOU WERE AND KNEW AND SHOULD HAVE KNOWN FROM THE INCIDENT ON 10/26/99, BECAUSE YOU ASKED QUESTIONS ABOUT THIS AND OTHERS &amp; TOLD YOU I WAS NOT AT FAULT AS WELL AS YOUR QUESTIONING RESIDENTS OF SCH. CO. PRISON. CAN YOU KEEP THIS OFFICER, DEFENDANT STEVE BLOSCHICHAK AWAY FROM PLAINTIFF TILL YOU GET THE ORDER FOR A RE-STRANDING. AFTER ALL THAT HAS BEEN DONE TO PLAINTIFF YOU PUT HIM ON THIS BLOCK TO SCARE MY PERSON, HARRASS MY PERSON, THREATEN MY PERSON AND/OR TO MAKE ME KEEP MY MOUTH SHUT. HERE'S PLAINTIFF SECOND REQUEST AND/OR GRIEVANCE ABOUT THE MATTER OF KEEPING THIS OFFICER AWAY <del>FROM PLAINTIFF</del> FROM PLAINTIFF           </p> <p>             I GAVE THIS REQUEST / GRIEVANCE TO LT. FLANNERY           </p>			
8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)		9. SIGNATURE Samuel E. Pullins	
<input type="checkbox"/> TO DC-14 CAR ONLY		<input type="checkbox"/> TO DC-14 CAR AND DC-15 IRS	
STAFF MEMBER		DATE	

DATE: 6/28/2000

EXHIBIT #17

BERKS COUNTY PRISON  
DOCTOR'S ORDER TO THE JAILERInmate Pullins Samuel BCP# 6444-98 Cell # 2103  
Date 6-14-00 Time 1200 Signature John H. Sunny, M.D.

<b>SPECIAL DIET</b>	<b>CLOTHING RESTRICTIONS</b>	<b>CHECKS</b>
<input checked="" type="checkbox"/> Liquid	<input checked="" type="checkbox"/> No sharps	<input checked="" type="checkbox"/> 10 min
<input checked="" type="checkbox"/> Soft	<input checked="" type="checkbox"/> Strip call	<input checked="" type="checkbox"/> 15 min
<input checked="" type="checkbox"/> Bland	<input checked="" type="checkbox"/> No shoe laces	<input checked="" type="checkbox"/> 30 min
<input checked="" type="checkbox"/> Food intake log	<input checked="" type="checkbox"/> Blanket and	
<input checked="" type="checkbox"/> Finger food	<input checked="" type="checkbox"/> shorts only	
<input checked="" type="checkbox"/> H.S. snack		
<input checked="" type="checkbox"/> Styrofoam or		
<input checked="" type="checkbox"/> paper tray		
<b>SPECIAL CONDITIONS</b>	<b>EXERCISE</b>	<b>MISCELLANEOUS</b>
<input checked="" type="checkbox"/> Suicide smock	<input checked="" type="checkbox"/> Denied	<input checked="" type="checkbox"/> Ice
<input checked="" type="checkbox"/> Prostraint chair	<input checked="" type="checkbox"/> Alone	<input checked="" type="checkbox"/> Ace wrap
<input checked="" type="checkbox"/> 4-point restraint	<input checked="" type="checkbox"/> No sports	<input checked="" type="checkbox"/> Bottom bunk
<input checked="" type="checkbox"/> Red bag	<input checked="" type="checkbox"/> No work	<input checked="" type="checkbox"/> Shower shoes
	<input checked="" type="checkbox"/> Bed rest	<input checked="" type="checkbox"/> Extra blanket
	<input checked="" type="checkbox"/> Light duty	<input checked="" type="checkbox"/> Extra S. shirt
		<input checked="" type="checkbox"/> Cleared for
		food service

## SPECIAL INSTRUCTIONS:

Bottom Bunk

## MEDICATION ADMINISTRATION INSTRUCTIONS:

## AMENDMENT OF THIS D.O.J. (Supersedes orders listed above)

Date \_\_\_\_\_ Time \_\_\_\_\_ Signature \_\_\_\_\_

\_\_\_ Discontinue checks \_\_\_ Released from N-unit \_\_\_ Regular Diet

\_\_\_ Other changes/orders (explanation needed):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

original in file

cc: 901 book - inmate - unit officer - shift commander - tx.dept. - (kitchen officer and kitchen supervisor only  
if diet related)

August 1997



LENGTH of RX

EXHIBIT #18  
DATE: 6/28/2000

SAMUEL E. PULLINS, BCP# 6444-98  
 HOUSING UNIT - J-103  
 BERKS COUNTY PRISON, 1287  
 COUNTY WELFARE ROAD  
 LEESPORT, PA. 19533-9397

EXHIBIT 193  
 6/28/2000

68450  
 RECORD# 6-14-2000

TO WHOM IT MAY CONCERN IN MEDICAL  
 RECORDS DEPT., AT POTTSVILLE HOSPITAL.

I, SAMUEL E. PULLINS WROTE RECORDS  
 ASKING FOR ALL THE RECORDS ~~of~~ of  
 BEING TREATED FOR LEG INJURIES ON 10-26-  
 99, WITH ALL INFORMATION AND ~~MATERIAL~~ <sup>MATERIAL</sup> THAT  
 HAPPENED THAT NIGHT, ALSO ALL INFORMATION  
 AND MATERIAL OF MY PERSON BEING TREATED  
 THE AFTERNOON 5/10 AND 5/13/2000 WITH  
 LOWER BACK AND RIGHT LEG X-RAYS.  
 I WROTE ASKING FOR THIS MATERIAL ON  
 5/22/99, I'M WRITTEN TO LET YOU KNOW  
 MY ADDRESS HAS CHANGED AND I'M IN  
 GREAT NEED OF THIS INFORMATION.

THANK YOU,  
 VERY TRULY YOURS,  
 Samuel E. Pullins

This was sent on 6-7-00 to S.C. Prison  
 Please contact them.

JUN 16

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

P.O. BOX 983

HARRISBURG, PA 17108

May 18, 2000

Samuel E. Pullins  
CTY-SCHUYLKILL  
Schuylkill County Prison  
010381  
2nd Sanderson Sts.  
Pottsville, PA 17901

Re: 1:00-cv-00872 Pullins v. County of Schuylkill  
Judge: Yvette Kane

Dear Sir/Madam:

Receipt is acknowledged of the document noted at the foot of this letter, subject as captioned above.

The matter has been forwarded to the Court for consideration.

Very truly yours,

MARY E. D'ANDREA, Clerk

By:   
Deputy Clerk

☐ Petition For Writ of Habeas Corpus ☒ Complaint  
☐ Transfer From Other District ☐ Other

NOTE: Please be advised that in order for service to be made a U.S. Marshal Form 285 (form enclosed) must be completed for each named defendant and returned to the Clerk's Office at the above address. Additional forms are available at the prison library or the U.S. Marshal's Office. (This does not apply to Petitions for Writ of Habeas Corpus.)

Enclosed: Notice of Consent regarding Magistrate Referral.